

August 24, 2022

Ms. Joyce Cook,
Senior Advisor to the
President's Office –
Safe Sport Entity

Fédération
Internationale de
Football Association
(FIFA)

FIFA-Strasse 20
Zurich, Switzerland

**Re: Collective Feedback on new FIFA Global Safe Sport Entity
Concept Note & Consultation Process**

Dear Ms. Cook,

We are writing to provide our joint-feedback on the ongoing proposed FIFA-led Global Safe Sport Entity Concept Note and other background information shared with us on July 5, 2022. Building on the multiple letters and meetings since the start of this process in 2021, we regret to see that this new round of consultation continues to show lack of transparency and communication.

At the forefront, FIFA should commit to demonstrating its own credible process and capacity towards addressing abuse within its own sphere of influence, including through learning and evaluation of how past cases were handled. The decisions outlined in the new Concept Note regarding new proposed scope, governance independence, and priority countries, among other aspects, raise important red flags. For instance:

Given the variety of support services required and impact on potential victims, we have supported narrowing down the Entity's scope to a manageable focus since our first inputs in writing (Recommendation IV, 16 July 2021 Letter). However, we strongly oppose the new 'children and young people' criteria currently being proposed, as well as the priority on 'active abuse cases'. Focusing on this group would in fact create additional capacity requirements, safeguarding needs and may hamper the Entity's effectiveness by excluding the very groups who are most likely to report. Further, the use of the term 'non-accidental' violence is unacceptable, as it undermines prevention efforts inherent to ILO standards.

We have also been highlighting the crucial importance of engaging with survivors and those with lived experience from the outset - not only to ensure the proposed Entity's effectiveness, but also to garner sufficient trust from potential victims (Recommendation I, 16 July 2022 Letter). It is worrying to witness a new "Survivor Focused Consultation" phase, without any apparent consideration of how to include their perspectives in safe and non-exploitative ways.

In terms of process, we hereby request information which can provide us with:

1. An overview of the consultation process, including overall goals, specific objectives, timeline;
2. Formalized expectations for inputs, detailed information on how our feedback will be integrated and/or analyzed in this process;
3. Details of FIFA team members and consultants working on this project, their mandate and roles;
4. Details of other focus groups taking place, including names of organizations and/or individuals involved; and
5. The planned physical, legal, emotional support system and financial compensation provided for survivors' expertise, as part of a trauma-informed approach.

In short, the new Concept Note raises more questions than answers. We have also received in the last 48 hours new documentation about an Interim Governance structure, which raises even more fundamental concerns. Decisions were taken without a basis of meaningful discussion or careful analysis of inputs provided on previous consultations.

It would be helpful to receive your response as early as possible, and at the latest by 31 August, so that we can assess our further involvement in this process before the upcoming Survivor Focused Consultation scheduled for 6 September, 2022. We remain at your disposal if you have any questions or would like to schedule an online meeting with us. We can be contacted by email at andrea@sportandrightsalliance.org.

Sincerely,

The Sport & Rights Alliance partners

The Army of Survivors

Committee to Protect Journalists

Football Supporters Europe

Human Rights Watch

ILGA World (The International Lesbian, Gay, Bisexual, Trans and Intersex Association)

International Trade Union Confederation

Transparency International Germany

World Players Association, UNI Global Union

Additional Supporters

Alison Quigley, former gymnast, survivor, advocate co-founder of Athlete Rights Australia
Gabriela Garton, Argentinian Association football player
Joanna Maranhão, Brazilian Olympian, survivor, advocate and researcher
Safe Sport International

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About the Sport & Rights Alliance

The Sport & Rights Alliance's mission is to promote the rights and well-being of those most affected by human rights risks associated with the delivery of sport. Its partners include **Amnesty International, The Army of Survivors, Committee to Protect Journalists, Football Supporters Europe, Human Rights Watch, ILGA World (The International Lesbian, Gay, Bisexual, Trans and Intersex Association), the International Trade Union Confederation, Transparency International Germany, and World Players Association, UNI Global Union.** As a global coalition of leading NGOs and trade unions, the SRA works together to ensure sports bodies, governments and other relevant stakeholders give rise to a world of sport that protects, respects, and fulfils international standards for human rights, labor rights, child wellbeing and safeguarding, and anti-corruption. The SRA Director, Andrea Florence is based in Sao Paulo, Brazil, and can be reached at +55 11 98420 0025 or andrea@sportandrightsalliance.org.